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Spirit Airlines, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

TIMOTHY MEACHAM,

Plaintiff,

v.

SPIRIT AIRLINES INC.; KERRIE
CONRAD, and; AIRPORT
TERMINAL SERVICES, INC., a
Missouri Corporation,

Defendants.

Case No. 3:15-cv-00338-SI

**DEFENDANT SPIRIT AIRLINES
INC.'S UNOPPOSED MOTION
FOR EXTENSION OF DEADLINE
TO ANSWER FIRST AMENDED
COMPLAINT**

CERTIFICATE OF COMPLIANCE WITH LR 7-1(a)

I hereby certify that defense counsel for Spirit Airlines, Inc. has conferred
with counsel for the plaintiff in a good faith effort to resolve this matter. Plaintiff

and Spirit Airlines, Inc. have agreed to the following request, and this motion is unopposed.

MOTION

Pursuant to LR 16-3, defendant Spirit Airlines, Inc. moves the Court for an extension of time to Wednesday, July 22, 2015 to file its Answer or otherwise respond to the plaintiff's First Amended Complaint.

MEMORANDUM IN SUPPORT OF MOTION

Plaintiff filed his First Amended Complaint on June 4, 2015. Rules 15(a)(3) and 6(d) of the Federal Rules of Civil Procedure would require Spirit Airlines to file its Answer to plaintiff's First Amended Complaint by June 22, 2015.

Steven Rosen is the trial attorney for this matter. He has been out of the office for an extended period of time due to illness, including more than 3 weeks in the hospital for treatment of meningitis and pneumonia. He remains out of the office while recuperating. Spirit Airlines requests an additional 30 days to investigate the amended claims and allegations and to draft its Answer to the First Amended Complaint with the input and advice of attorney Steven Rosen.

Defense counsel for Spirit Airlines spoke with Mr. Ball, counsel for the plaintiff, on June 22, 2015 and requested 30 days of additional time to prepare and file an Answer to the First Amended Complaint. Mr. Ball agreed with that request

and defendant Spirit Airlines seeks court approval of the extension of time in accordance with FRCP 15(a)(3), LR 16-3, and LR 29-1.

It is not expected that this requested extension of time will cause any significant delay in the progression of the action.

This motion is made in good faith and not for purposes of delay. Spirit Airlines respectfully requests that the Court grant its request for a 30-day extension of time to answer the First Amended Complaint.

DATED this 22nd of June, 2015.

s/ Elizabeth M. Ferrarini
Elizabeth M. Ferrarini, OSB # 944859
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Of Attorneys for Defendant Spirit Airlines, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **DEFENDANT SPIRIT AIRLINES INC.'S UNOPPOSED MOTION FOR EXTENSION OF DEADLINE TO ANSWER FIRST AMENDED COMPLAINT** by the following indicated method or methods:

- ☒ Notice of this filing will be sent by e-mail to plaintiff's counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

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DATED this 22nd day of June, 2015.

s/ Elizabeth M. Ferrarini
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